



Mel Carnahan, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

MEMORANDUM

DATE: APR 10 2000

TO: Air Pollution Control Program Procedures Manual

FROM: Roger D. Randolph, Director
Air Pollution Control Program

A handwritten signature in black ink, appearing to be "RDR", is written over the name "Roger D. Randolph".

SUBJECT: Permitting Asphalt/Concrete Plants for Temporary Highway Projects

I. STATEMENT OF ISSUE

When highway projects, such as building roads, etc. are constructed, the project generally requires that either an asphalt or concrete batch plant is readily available to produce the road surface material. Therefore, these plants are often either located on or adjacent to the highway construction activities on relatively small pieces of leased property.

Highway projects are also temporary in nature and will usually be of relatively short durations. In addition, these highway project location(s) are generally not accessible to the public during the time when an associated asphalt/concrete plant(s) would be in operation.

The normal New Source Review (NSR) permitting process for asphalt/concrete plants is to evaluate the ambient impact from the installation's operation at the nearest property boundary. A daily limitation is usually established that restricts the maximum amount of production the plant could do in any single 24-hour period and still be in compliance with the National Ambient Air Quality Standard (NAAQS).



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Limiting an asphalt/concrete plant which is being used on-site of a temporary highway projects, as indicated above, will typically not allow sufficient production capabilities to complete the project in a timely manner. The resulting delays in the construction of highway projects would increase the overall projects cost and cause greater inconvenience to the public. However, the Air Pollution Control Program is responsible for ensuring the protection of the public health of the citizens in the area where these temporary highway projects are being undertaken.

II. RECOMMENDATION

When evaluating temporary highway projects where the asphalt/concrete plant is located on or adjacent to the project site, the distance to the closest residence or to where the public could reasonably expected to be found shall be used for the ambient impact analysis.

Substituting the distance to the closest residence for the nearest property boundary will generally allow for a less restrictive daily production level from these types of plants being used for temporary highway projects and reduce any un-avoidable delays in completing these projects. As the asphalt/concrete plant would still be restricted to be in compliance with the NAAQS, the general public would not be exposed to elevated dust concentrations due to this new policy and the protection of the public health would still be assured.

This policy does not apply to any portable plants except those located either on or adjacent to the related highway construction activities. This policy shall also not be used to allow these portable plants to avoid using the best available controls or best management/work practices (e.g. dust suppression). In addition, the duration of these permits must also be limited to the duration of the specific road building project. For example, if a contract to pave is to be completed in 100 work days, then the permit should condition the temporary project to this time frame.

RDR:wfp